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Case 1:06-cv-13085-TPG

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ALLEN APPLESTEIN, et al.,

Plaintiffs,

- against -

REPUBLIC OF ARGENTINA,

Defendant.

Civil Action No. 02-CV-04124 (TPG)

APPLESTEIN,

Plaintiff,

- against -

ARGENTINA REPUBLIC, et al.,

Defendants.

Civil Action No. 02-CV-01773 (TPG)

FRANCESCHI, et al.,

Plaintiffs,

- against -

REP. OF ARGENTINA,

Defendant.

Civil Action No. 03-CV-04693 (TPG)

(captions continue on following pages)

STIPULATION AND ~~RECEIPT~~ ORDER

MAZZINI, et al., Plaintiffs, - against - THE REPUBLIC OF ARGENTINA, Defendant.	Civil Action No. 03-CV-08120 (TPG)
MORATA, et al., Plaintiffs, - against - THE REPUBLIC OF ARGENTINA, Defendant.	Civil Action No. 04-CV-03314 (TPG)
MODES, et al., Plaintiffs, - against - THE REPUBLIC OF ARGENTINA, et al., Defendants.	Civil Action No. 04-CV-06137 (TPG)
MARIA FAUST CILLI, et al., Plaintiffs, - against - THE REPUBLIC OF ARGENTINA, Defendant.	Civil Action No. 04-CV-06594 (TPG)
<i>(captions continue on following pages)</i>	

<p>ROSA, et al.,</p> <p style="text-align: center;">Plaintiffs,</p> <p>- against -</p> <p>THE REPUBLIC OF ARGENTINA,</p> <p style="text-align: center;">Defendant.</p>	Civil Action No. 04-CV-07504 (TPG)
<p>CONSOLINI, et al.,</p> <p style="text-align: center;">Plaintiffs,</p> <p>- against -</p> <p>THE REPUBLIC OF ARGENTINA,</p> <p style="text-align: center;">Defendant.</p>	Civil Action No. 05-CV-00177 (TPG)
<p>FERRI, et al.,</p> <p style="text-align: center;">Plaintiffs,</p> <p>- against -</p> <p>THE REPUBLIC OF ARGENTINA,</p> <p style="text-align: center;">Defendant.</p>	Civil Action No. 05-CV-02943 (TPG)
<p>RIGUEIRO, et al.,</p> <p style="text-align: center;">Plaintiffs,</p> <p>- against -</p> <p>THE REPUBLIC OF ARGENTINA,</p> <p style="text-align: center;">Defendant.</p>	Civil Action No. 05-CV-03089 (TPG)
<p>BETTONI, et al.,</p> <p style="text-align: center;">Plaintiffs,</p> <p>- against -</p> <p>THE REPUBLIC OF ARGENTINA,</p> <p style="text-align: center;">Defendant.</p>	Civil Action No. 05-CV-04299 (TPG)
<i>(captions continue on following pages)</i>	

<p>FEDECOSTANTE, et al.,</p> <p>Plaintiffs,</p> <p>- against -</p> <p>REPUBLIC OF ARGENTINA,</p> <p>Defendant.</p>	Civil Action No. 05-CV-04466 (TPG)
<p>LISI, et al.,</p> <p>Plaintiffs,</p> <p>- against</p> <p>REPUBLIC OF ARGENTINA,</p> <p>Defendant.</p>	Civil Action No. 05-CV-06002 (TPG)
<p>ROSSINI, et al.,</p> <p>Plaintiffs,</p> <p>- against -</p> <p>REPUBLIC OF ARGENTINA, et al.,</p> <p>Defendants.</p>	Civil Action No. 05-CV-06200 (TPG)
<p>KLEIN, et al.,</p> <p>Plaintiffs,</p> <p>- against -</p> <p>REPUBLIC OF ARGENTINA,</p> <p>Defendant.</p>	Civil Action No. 05-CV-06599 (TPG)
<p>LOVATI, ,</p> <p>Plaintiff,</p> <p>- against -</p> <p>REPUBLIC OF ARGENTINA,</p> <p>Defendant.</p>	Civil Action No. 05-CV-08195 (TPG)

(captions continue on following pages)

<div>BOTTI, et al., Plaintiffs, - against - THE REPUBLIC OF ARGENTINA, et al., Defendants.</div>	Civil Action No. 05-CV-08687 (TPG)
<div>PASQUALI, Plaintiff, - against - REPUBLIC OF ARGENTINA, Defendant.</div>	Civil Action No. 05-CV-10636 (TPG)
<div>BEYER, et al., Plaintiffs, - against - REPUBLIC OF ARGENTINA, Defendant.</div>	Civil Action No. 07-CV-00098 (TPG)
<div>BORGRA, et al., Plaintiffs, - against - REPUBLIC OF ARGENTINA, Defendant.</div>	Civil Action No. 07-CV-05807 (TPG)
<div>MARIE LAURETTE DUSSAULT, Plaintiff, -against- THE REPUBLIC OF ARGENTINA, Defendant.</div>	Civil Action No. 06-CV-13085 (TPG)

WHEREAS, Plaintiffs in all of the above-captioned matters except *Dussault v. Republic of Argentina* (No. 06 Civ. 13085) (the “Applestein Plaintiffs”) filed a Motion for Turnover Order against non-party Bank of New York Mellon (“BNY Mellon”) on August 7, 2014 (the “Applestein Turnover Motion”); and

WHEREAS, by Stipulation “So Ordered” by the Court on August 21, 2014, the time for BNY Mellon to respond to the Applestein Turnover Motion was extended to and including September 15, 2014, and the time for the Applestein Plaintiffs to reply in further support of the Applestein Turnover Motion was extended to and including September 30, 2014; and

WHEREAS, plaintiff in the matter captioned *Dussault v. Republic of Argentina* (No. 06 Civ. 13085) (the “Dussault Plaintiff”) filed a Motion Pursuant to Rule 69(a)(1) of the Federal Rules of Civil Procedure and Section 5225(b) of the New York Civil Practice Law and Rules for an Order Against Bank of New York Mellon on August 18, 2014 (the “Dussault Turnover Motion”, and together with the Applestein Turnover Motion, the “Motions”); and

WHEREAS, on September 5, 2014, the Dussault Plaintiff and BNY Mellon submitted to the Court a Stipulation, dated August 29, 2014, pursuant to which the Dussault Plaintiff and BNY Mellon agreed to extend the time for BNY Mellon to respond to the Dussault Turnover Motion to and including September 22, 2014, and further agreed to extend the time for the Dussault Plaintiff to reply in further support of her motion to and including October 6, 2014; and

WHEREAS, the Court has not “So Ordered” the Stipulation in the Dussault matter; and

WHEREAS, given substantial similarities between the Motions, and in an effort to conserve judicial resources and promote judicial efficiency, the Applestein Plaintiffs, the Dussault Plaintiff, and BNY Mellon wish to coordinate the remainder of briefing on and any hearing regarding the Motions;

IT IS HEREBY STIPULATED by and between the undersigned counsel for the Applestein Plaintiffs, the Dussault Plaintiff, and non-party BNY Mellon as follows:

1. BNY Mellon will file a consolidated opposition to the Motions on or before September 22, 2014;
2. The Applestein Plaintiffs and the Dussault Plaintiffs will file their reply briefs in further support of the Motions on or before October 9, 2014;
3. Oral argument, if any, on the Motions will be heard at the same time, on a date and time to be determined by the Court.

IT IS FURTHER STIPULATED AND AGREED that this Stipulation may be signed in counterparts and that facsimile copies shall be deemed originals for all purposes.

Dated: New York, New York
September 5, 2014


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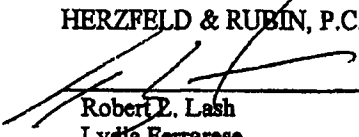
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SO ORDERED:


U.S.D.J.

Dated: 9/12/14 